

Roddrick Newhouse, Trustee
401 Century Parkway
Suite 715
Allen, TX 75013
Telephone: (469) 777-6560
Email: rn7trustee@gmail.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION**

IN RE:	§	
	§	
ROTO, INC.,	§	CASE NO. 22-60072-RLJ7
	§	
Debtor.	§	Chapter 7
	§	

**MOTION TO RE-OPEN CHAPTER 7 CASE
PURSUANT TO 11 U.S.C. §350 AND BANKRUPTCY RULE 5010**

ANY PARTY WISHING TO RESPOND TO THIS PLEADING MUST FILE THE RESPONSE WITH THE U.S. BANKRUPTCY CLERK, GEORGE MAHON FEDERAL BUILDING, 1205 TEXAS AVENUE, ROOM 306, LUBBOCK, TX 79401-4002, WITHIN 21 DAYS OF THE SERVICE OF THIS PLEADING. IF A RESPONSE IS FILED AND SERVED TIMELY, A HEARING ON THE RESPONSE WILL BE SCHEDULED WITH A NOTICE TO THE RESPONDING PARTY ONLY.

IF NO RESPONSE IS FILED AND TIMELY SERVED ON THE TRUSTEE, THE COURT MAY DEEM THE RELIEF REQUESTED UNOPPOSED AND MAY ENTER AN ORDER GRANTING THE RELIEF REQUESTED WITHOUT FURTHER NOTICE TO ANY PARTY.

TO THE HONORABLE RONALD L. JONES, U. S. BANKRUPTCY JUDGE:

Roddrick Newhouse, Trustee, files this Motion to Reopen Pursuant to 11 U.S.C. §350 and Bankruptcy Rule 5010 and in support respectfully shows the Court the following:

1. **ROTO, INC.,** Debtor, filed its voluntary petition for relief under Chapter 7 of the Bankruptcy Code on December 28, 2022. Roddrick Newhouse was appointed Interim Trustee of the bankruptcy estate.

2. The Trustee's Report of No Distribution was filed on April 26, 2023 and trustee was

discharged and the case was closed on May 30, 2023.

3. The Interim Trustee has received funds in connection with a refund from Ford Credit listed on bankruptcy schedules.

4. The former Trustee, Roddrick Newhouse, believes the case should be re-opened to allow the trustee to administer the assets.

5. The former Trustee requests the U.S. Trustee to appoint a trustee to administer the case and the property.

6. The assets in this case constitute cause under 11 U.S.C. §350 to reopen this case.

FOR THESE REASONS, Roddrick Newhouse, Trustee prays that this Court enter an Order:

- Reopening this case;
- Directing the U.S. Trustee to appoint a Chapter 7 trustee; and
- Granting any other relief this Court deems appropriate.

Respectfully submitted,

By: /s/ Roddrick Newhouse
Roddrick Newhouse
CHAPTER 7 TRUSTEE
401 Century Parkway
Suite 715
Telephone: (469) 777-6560
Email: rn7trustee@gmail.com

CERTIFICATE OF SERVICE

I, Roddrick Newhouse, certify that a true and correct copy of the ***MOTION TO RE-OPEN CHAPTER 7 CASE PURSUANT TO 11 U.S.C. §350 AND BANKRUPTCY RULE 5010*** was forwarded by electronic transmission or first class mail, postage prepaid, to the United States Trustee, 1100 Commerce Street, Room 976, Dallas, TX 75242, and to the parties included on the attached Service List, on this 24th day of July 2023.

/s/ Roddrick Newhouse
Roddrick Newhouse, Trustee

Label Matrix for local noticing
0539-6

Case 22-60072-rlj7

Northern District of Texas

San Angelo

Mon Jul 24 08:49:23 CDT 2023

(p)FORD MOTOR CREDIT COMPANY
P O BOX 62180
COLORADO SPRINGS CO 80962-2180

Ally Bank, c/o AIS Portfolio Services, LLC
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

(p)DEERE CREDIT SERVICES INC
ATTN LITIGATION & RECOVERY DEPARTMENT
PO BOX 6600
JOHNSTON IA 50131-6600

First Bank Texas
100 Willow Bend Dr.
Willow Park, TX 76008-5746

Roto, Inc.
3135 Executive Dr.
San Angelo, TX 76904-6801

Tom Green CAD
Linebarger Goggan Blair & Sampson, LLP
c/o Sherrel K. Knighton
2777 N. Stemmons Freeway
Suite 1000
Dallas, TX 75207-2328

U.S. Bank National Association
14841 Dallas Parkway, Suite 425
Dallas, TX 75254-8067

306 Federal Building
1205 Texas Avenue
Lubbock, TX 79401-4037

350th District Court
300 Oak St., Ste. 404
Abilene, TX 79602-1534

AMEX
P.O. Box 981537
El Paso, TX 79998-1537

AT&T
P.O. Box 6463
Carol Stream, IL 60197-6463

Airgas
2929 N. Bryant Blvd.
San Angelo, TX 76903-2362

Airgas USA, LLC
110 West 7th Street, Suite 1300
Tulsa, OK 74119-1106

Allen Young Office Machines
60 N. Chadbourne
San Angelo, TX 76903-5849

Ally
Payment Processing Center
P.O. Box 9001948
Louisville, KY 40290-1948

Ally Bank
AIS Portfolio Services, LLC
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Angelo Plumbing Supply
2500 N. Bryant Blvd.
San Angelo, TX 76903-2868

Antraquip Coporation
758 Bowman Ave.
Hagerstown, MD 21740-6809

Aramark/Ameripride Services
2680 Palumbo Dr.
Lexington, KY 40509-1234

B & W Trailer
P.O. Box 5277
San Angelo, TX 76902-5277

BenMark Supply Company
P.O. Box 198
Midland, TX 79702-0198

Bill Williams Tire Center
P.O. Box 1772
Midland, TX 79702-1772

Bitco
P.O. Box 933370
Atlanta, GA 31193-3370

Boley-Featherston Ins.
P.O. Box 97513
Whichita Falls, TX 76307-7513

Bridgestone Hose Power
50 Industrial Loop North
Orange Park, FL 32073-6258

CAN-DOO Budget Rentals
301 Goliad Dr.
Abiene, TX 79601-6246

Capital One
P.O. Box 60519
City of Industry, CA 91716-0519

Chrysler Capital
P.O. Box 660335
Dallas, TX 75266-0335

City of San Angelo
P.O. Box 5820
San Angelo, TX 76902-5820

Core & Main
P.O. Box 283320
St Louis, MO 63146

Cure Payment Recovery Solutions
1490 William Floyd Pkwy, Ste. 104
East Yaphank, NY 11967-1820

Daimler Truck Financial
P.O. Box 4160
Carol Stream, IL 60197-4160

Dean & Linebarger
305 W. Twohig
San Angelo, TX 76903-6319

E&R Supply Co.
1717 S. Chadbourne
San Angelo, TX 76903-8596

Ed Cheattle
2726 Oak Mountain Trail
San Angelo, TX 76904-7417

Fenix Capital Funding, LLC
9265 4th Ave., 2nd Floor
Brooklyn, NY 11209-7006

First National Bank & Trust Co.
First Bank Texas
1100 E Main St
Weatherford, OK 73096-5799

First National Bank & Trust Co.
First Bank Texas
1849 South 1st
Abilene, TX 79602-1107

First National Bank & Trust Co.
First Bank Texas
P.O. Box 968
Baird, TX 79504-0968

FleetPride
P.O. Box 847118
Dallas, TX 75284-7118

Ford Credit
P.O. Box 650575
Dallas, TX 75265-0575

Gas Card
P.O. Box 51140
Midland, TX 79710-1140

HUBER Technology
1009 Airlie Parkway
Denver, NC 28037-7705

Hargraves Tire & Auto
1617 Pulliam St.
San Angelo, TX 76905-5111

Hay, Wittenburg, Davis, Caldwell, & Bale
Attn: Larry W. Bale
P.O. Box 271
San Angelo, TX 76902-0271

John Deer Financial
P.O. Box 650215
Dallas, TX 75265-0215

John Voller
4066 Monticello St.
Abilene, TX 79605-3823

Kings County Supreme Court
360 Adams St #4
Brooklyn, NY 11201-3749

LG Funding LLC
1218 Union Street.
Brooklyn, NY 11225-1512

McCoys Building Supply
P.O. Box 1362
San Marcus, TX 78667-1362

Mercedes-Benz Financial
P.O. Box 685
Roanoke, TX 76262-0685

Miller Ag Service & Supply
P.O. Box 625
Eden, TX 76837-0625

Optimum Business
1111 Stewart Ave.
Bethpage, NY 11714-3533

Phillips and Associates, CPA's
2709 81st St., Ste. A
Lubbock, TX 79423-2225

Precision Pump Systems
P.O. Box 73149
Houston, TX 77273-3149

QFS Capital Funding
110 E Broward Blvd.
Fort Lauderdale, FL 33301-3503

Rendall Sikes PLLC
Attn: Celena Adcock
5310 Harvest Hill Rd., Ste. 260
Dallas, TX 75230-5811

SKG Engineering
1122 S. Bryant
San Angelo, TX 76903

Texas Mutual
P.O. Box 841843
Dallas, TX 75284-1843

The Leyvi Law Group, P.C.

Attn: Leyvi Maksim

227 Sea Breeze Ave., Ste. 2A

Brooklyn, NY 11224-3794

Tom Green County Appraisal District

2302 Pulliam

San Angelo, TX 76905-5165

Tom Halfman

7889 Elk Run

San Angelo, TX 76901-4961

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(p)US BANK
PO BOX 5229
CINCINNATI OH 45201-5229

United States Trustee
1100 Commerce Street
Room 976
Dallas, TX 75242-0996

Velocity
290 Broadhollow Rd.
Melville, NY 11747-4836

Vulcan Materials
P.O. Box 849131
Dallas, TX 75284-9131

WTGF WTG Fuels
P.O. Box 3514
Midland, TX 79702-3514

Wells Fargo
420 Montgomery St.
San Francisco, CA 94104-1298

West TX Rock Resources, LLC
P.O. Box 871
Roscoe, TX 79545-0871

Yellowhouse Machinery Co.
P.O. Box 31388
Amarillo, TX 79120-1388

Roddrick Breon Newhouse
401 Century Pkwy
Unit 715
Allen, TX 75013-8043

Ronald M. Mapel
Ronald M. Mapel, Attorney at Law
3119 Cumberland Drive
San Angelo, TX 76904-6110

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Ford Motor Credit Company LLC
PO Box 62180
Colorado Springs, CO 80962

John Deere Construction & Forestry Company
P.O. Box 6600
Johnston, IA 50131

(d)National Bankruptcy Service Center
Ford Credit
P.O. Box 62180
Colorado Springs, CO 80962

US Bank
P.O. Box 790179
St. Louis, MO 63179

End of Label Matrix
Mailable recipients 72
Bypassed recipients 0
Total 72